

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FAIRFIELD SENTRY LIMITED, et al.,

Defendants.

Adv. Pro. No. 09-01239 (SMB)

**STIPULATION EXTENDING TIME TO MOVE,
ANSWER OR OTHERWISE RESPOND TO TRUSTEE'S
COMPLAINT AND ADJOURNING THE PRE-TRIAL CONFERENCE**

WHEREAS, Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff (the "Trustee") commenced the above-captioned adversary proceeding (the "Adversary Proceeding") against Fairfield Sentry Limited, Greenwich Sentry, L.P., and Greenwich Sentry Partners, L.P. on May 16, 2009; and

WHEREAS, on July 20, 2010, the Trustee filed an Amended Complaint against defendants Fairfield Sentry Limited, Greenwich Sentry, L.P., Greenwich Sentry Partners, L.P., Fairfield Sigma Limited, Fairfield Lambda Limited, Chester Global Strategy Fund Limited, Chester Global Strategy Fund, Irongate Global Strategy Fund Limited, Fairfield Greenwich Fund (Luxembourg), Fairfield Investment Fund Limited, Fairfield Investors (Euro) Limited, Fairfield Investors (Swiss Franc) Limited, Fairfield Investors (Yen) Limited, Fairfield Investment Trust,

FIF Advanced, Ltd., Sentry Select Limited, Stable Fund, Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda), Ltd., Fairfield Greenwich Advisors LLC, Fairfield Greenwich GP, LLC, Fairfield Greenwich Partners, LLC, Fairfield Heathcliff Capital LLC, Fairfield International Managers, Inc., Fairfield Greenwich (UK) Limited, Greenwich Bermuda Limited, Chester Management Cayman Limited, Walter Noel, Jeffrey Tucker, Andrés Piedrahita, Corina Noel Piedrahita, Mark McKeefry, Daniel Lipton, Amit Vijayvergiya, Gordon McKenzie, Richard Landsberger, Philip Toub, Charles Murphy, Robert Blum, Andrew Smith, Harold Greisman, Gregory Bowes, Lourdes Barreneche, Cornelis Boele, Santiago Reyes, Jacqueline Harary (the “Amended Complaint”); and

WHEREAS, the Trustee effected service of the Amended Summons and Amended Complaint on defendants Fairfield Sentry Limited, Fairfield Sigma Limited, Fairfield Lambda Limited, Greenwich Sentry, L.P., and Greenwich Sentry Partners, L.P. and subsequently settled his claims with Fairfield Sentry Limited, Fairfield Sigma Limited, Fairfield Lambda Limited, Greenwich Sentry, L.P., and Greenwich Sentry Partners, L.P. and consent judgments have been entered as against them; and

WHEREAS, the Trustee filed notices of dismissal with prejudice as against Chester Global Strategy Fund Limited, Chester Global Strategy Fund, L.P., and Irongate Global Strategy Fund Limited; and

WHEREAS, the Trustee filed notices of dismissal without prejudice as against Fairfield Greenwich GP, LLC, Sentry Select Limited, Fairfield Greenwich Partners LLC, Greenwich Bermuda Limited, Fairfield Heathcliff Capital LLC, Fairfield Greenwich (UK) Limited, Fairfield Investors (Yen) Limited, Fairfield Investors (Swiss Franc) Limited, Fairfield Investment Trust, FIF Advanced, Ltd., and Chester Management Cayman Limited; and

WHEREAS, the Trustee filed a notice of dismissal with prejudice as against Fairfield Greenwich Fund (Luxembourg); and

WHEREAS, the Trustee has effected service of the Amended Summons and Amended Complaint on defendants Amit Vijayvergiya, Stable Fund LP, Cornelis Boele, Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda) Limited, Fairfield Greenwich Advisors LLC, Fairfield International Managers, Inc., Fairfield Investment Fund Limited, Fairfield Investors (Euro) Limited, Mark McKeefry, Daniel Lipton, Gordon McKenzie, Richard Landsberger, Philip Toub, Charles Murphy, Andrew Smith, Harold Greisman, Lourdes Barreneche, Santiago Reyes, Jacqueline Harary, Corina Noel Piedrahita, Andres Piedrahita, Walter Noel, Gregory Bowes, Jeffrey Tucker, and Robert Blum (collectively, the “Stipulation Defendants”); and

WHEREAS, the Stipulation Defendants have requested an extension of time to move, answer or otherwise respond to the Amended Complaint and continue the date of the pre-trial conference.

NOW, THEREFORE, it is stipulated and agreed by and between the Trustee and the Stipulation Defendants as follows:

1. The time by which the Stipulation Defendants may move, answer or otherwise respond to the Amended Complaint is further extended from March 19, 2014, up to, and including **April 30, 2014**.
2. The pre-trial conference previously scheduled for May 28, 2014 at 10:00 a.m. shall be adjourned to **July 30, 2014 at 10:00 a.m.**
3. All times set forth in this Stipulation to move, answer or otherwise respond to the Amended Complaint shall be subject to and superseded by any applicable court order providing for a later response date.

4. The parties to this Stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect any such rights and defenses, including challenges to personal jurisdiction, or the jurisdiction of this Court or any other Court.

5. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 5600).

Dated: New York, NY
March 14, 2014

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Date: New York, NY
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